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Re: Hotel Housekeeping Musculoskeletal Injury Prevention Standard

Dear Ms. Neidhardt,

Thank you for accepting our comments; we apologize for the delay in submitting them due to UCLA closure over the holidays.

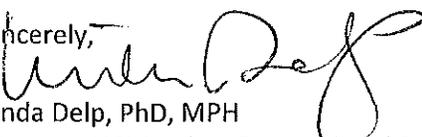
We submit these comments as a follow up to our comments dated September 11, 2015. Those comments addressed the importance of various components of the standard to prevent MSI among hotel housekeepers, specifically Health and Safety Committees, a MIPP, Job Hazard Analysis, and Employee training and participation.

We reiterate our belief in the importance of the components mentioned in that letter. The comments here specifically address the importance of information and quality training to ensure employee participation in an effective program and to facilitate reporting, recordkeeping and evaluation of the program. They are based on our extensive experience at LOSH with training and evaluation programs for both employees and employers.

We believe the following components of the standard are key to its effective implementation:

- **Training for supervisors and workers** on the signs and symptoms of MSI and on risk factors that contribute to MSIs. Early recognition of MSIs is critical to timely evaluation and treatment for individual workers and identification of risk factors is a prerequisite to reducing risk and preventing MSIs in the workforce.
- Workers need a **clear mechanism to report** symptoms and injuries without fear of reprisal. As noted above, prompt reporting is also key to treatment and to identification of injury trends in the workforce.
- **Guidance on appropriate controls** - The Cal/OSHA publication, "Working Safer and Easier for Janitors, Custodians and Housekeepers," is an important reference and should be included as an appendix to the standard with reference to specific control measures relevant to this workforce included in the standard itself.

Please feel free to contact me at 310 794 5976 or ldelp@ucla.edu with any questions and we thank you for your consideration.

Sincerely,

Linda Delp, PhD, MPH
Director, UCLA Labor Occupational Safety and Health Program